

EXHIBIT 16

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

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4 IN RE: TERRORIST :
5 ATTACKS ON : 03-MDL-1570
6 SEPTEMBER 11, 2001 : (GBD)(SN)

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8 - - -

9 Monday, October 21, 2019

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11 THIS TRANSCRIPT CONTAINS
12 CONFIDENTIAL MATERIAL

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14 Videotaped deposition of IBRAHIM
15 ABDULLAH, Ph.D., as 30(b)(6) designee for World
16 Assembly of Muslim Youth-International, taken
17 pursuant to notice, was held at the NH
18 Collection Madrid Abascal Hotel, Calle de Jose'
19 Abascal, 47, 28003 Madrid, Spain, beginning at
20 9:50 a.m., on the above date, before Lisa V.
21 Feissner, RDR, CRR, Notary Public.

22

23 GOLKOW LITIGATION SERVICES
877.370.3377 ph | 917.591.5672 fax
24 deps@golkow.com

1 November, December.

2 Q. And was Mr. Khatib still working
3 for WAMY-Canada when you started?

4 A. So he was suspended from working.
5 He did not work for --

6 (The witness and interpreter
7 conferred in Arabic.)

8 A. He did not work. He was fired.

9 Q. So he was fired sometime between
10 April of 1999 and the fall of 1999 when you
11 arrived, correct?

12 A. Correct.

13 Q. Do you know the month you rehired
14 Mr. Khatib in 2000, the following year?

15 A. I don't remember.

16 Q. Or the season? Was it spring,
17 summer?

18 A. (In English.) Spring.

19 (Through interpreter.) Spring.

20 Q. Spring? Was there a specific
21 person, an Imam or a mosque that you relied on
22 when you said Mr. Khatib had a good reputation
23 in the Canadian -- Montreal community? In
24 other words, did somebody in Canada say, hey,

1 testimony.

2 MR. GOETZ: Objection to scope.

3 You can translate.

4 A. Yes.

5 Q. And would you see Mr. Jarrah there
6 when you were at the Embassy?

7 MR. GOETZ: Objection, scope.

8 INTERPRETER: Mr. Jarrah?

9 MR. MALONEY: The same guy we were
10 talking about, yeah, Jarrah.

11 A. I don't remember.

12 Q. Did you see Khaled al-Suwailem at
13 the Embassy when you visited?

14 MR. SHEN: Objection, scope.

15 MR. GOETZ: Objection, scope.

16 MR. MOHAMMEDI: Yeah, it's getting
17 out of control.

18 MR. GOETZ: Counsel, we litigated
19 this issue before Magistrate Judge
20 Netburn --

21 MR. MOHAMMEDI: 30(b)(6).

22 MR. GOETZ: -- and there were
23 specific areas that she took out. One
24 of those was communications with the

1 Q. Do you recall whether he visited
2 WAMY-International shortly before September 11,
3 2001?

4 A. He did not visit the office.

5 Q. Did he visit with you during that
6 time period?

7 A. No. He was not with me. But I met
8 him in some hotel or other place.

9 Q. What hotel?

10 A. I don't remember.

11 Q. Do you recall approximately when
12 that meeting happened?

13 A. Before September 11. I just do not
14 recall how many days before.

15 Q. What was the purpose of the
16 meeting?

17 A. To greet him as any Saudi visitor.
18 That is a well-known thing to do.

19 Q. Who else was present?

20 A. I don't remember.

21 Q. Were there other people present
22 when you met him?

23 A. (In English.) No.

24 (Through interpreter.) No. It was